

1 **McGUIREWOODS LLP**
2 BENJAMIN J. SITTER SBN #273394
3 Tower Two-Sixty
4 260 Forbes Avenue, Suite 1800
5 Pittsburgh, PA 15222-3142
6 Telephone: 412.667.6000
7 Facsimile: 412.667.7991
8 Emails: bsitter@mcguirewoods.com

9 Attorneys for Defendant
10 Santander Consumer USA Inc.

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA

CRYSTAL GUEVARA,

Plaintiff,

vs.

SANTANDER CONSUMER USA INC., an
Illinois corporation; and DOES 1 through 10,
inclusive,

Defendants.

CASE NO. 22CV023246

NOTICE OF FILING OF REMOVAL

Complaint Filed: December 6, 2022

TO THE COURT AND ALL PARTIES:

PLEASE TAKE NOTICE that on January 12, 2023, Defendant Santander Consumer USA Inc. ("SC") filed, in the United States District Court for the Northern District of California, a Notice of Removal of this action pursuant to 28 U.S.C. §§ 1332 and 1441. A copy of the Notice of Removal, without exhibits, is attached hereto as *Exhibit A*, and it is served and filed herewith.

Please take further notice that, pursuant to 28 U.S.C. § 1446, the filing of the Notice of Removal with the United States District Court, together with the filing of this Notice of Filing of Removal, effects the removal of this action, and this Court shall proceed no further unless and until the case has been remanded.

///

1 DATED: January 12, 2023

MCGUIREWOODS LLP

2
3 By: /s/ Benjamin J. Sitter

4 Benjamin J. Sitter

5 Attorneys for Defendant

6 Santander Consumer USA Inc.

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

I am employed in the County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action; my business address is Two Embarcadero Center, Suite 1300, San Francisco, CA 94111-3821.

On January 12, 2023, I served the following document(s) described as **NOTICE OF FILING OF REMOVAL** on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as follows:

Brandon A. Block, Esq.
Law Offices of Brandon A. Block
9440 Santa Monica Blvd., Suite 301
Beverly Hills, CA 90210
Email: brandon@bblocklaw.com
Tel: 424.600.9454

Attorneys for Plaintiff *Crystal Guevara*

☒ **BY MAIL:** I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing with the United States Postal Service. Under that practice, it would be deposited with the United States Postal Service that same day in the ordinary course of business. Such envelope(s) were placed for collection and mailing with postage thereon fully prepaid at San Francisco, CA, on that same day following ordinary business practices. (C.C.P. § 1013 (a) and 1013a(3))

☐ **BY FACSIMILE:** At approximately _____, I caused said document(s) to be transmitted by facsimile pursuant to Rule 2008 of the California Rules of Court. The telephone number of the sending facsimile machine was 310.315.8210. The name(s) and facsimile machine telephone number(s) of the person(s) served are set forth in the service list. The document was transmitted by facsimile transmission, and the sending facsimile machine properly issued a transmission report confirming that the transmission was complete and without error.

☐ **BY OVERNIGHT DELIVERY:** I deposited such document(s) in a box or other facility regularly maintained by the overnight service carrier, or delivered such document(s) to a courier or driver authorized by the overnight service carrier to receive documents, in an envelope or package designated by the overnight service carrier with delivery fees paid or provided for, addressed to the person(s) served hereunder. (C.C.P. § 1013(d)(e))

☐ **BY HAND DELIVERY:** I delivered such envelope(s) by hand to the office of the addressee(s). (C.C.P. § 1011(a)(b))

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signed on January 12, 2023, at San Francisco, CA.

Denise Lamb